

1 **WILLKIE FARR & GALLAGHER LLP**
2 BENEDICT Y. HUR (SBN: 224018)
3 bhur@willkie.com
4 SIMONA AGNOLUCCI (SBN: 246943)
5 sagnolucci@willkie.com
6 EDUARDO E. SANTACANA (SBN: 281668)
7 esantacana@willkie.com
8 LORI C. ARAKAKI (SBN: 315119)
9 larakaki@willkie.com
10 ARGEMIRA FLOREZ (SBN: 331153)
11 aflorez@willkie.com
12 One Front Street, 34th Floor
13 San Francisco, CA 94111
14 Telephone: (415) 858-7400
15 Facsimile: (415) 858-7599

16 Attorneys for Defendant
17 GOOGLE LLC

18 **BOIES SCHILLER FLEXNER LLP**
19 Mark C. Mao (CA Bar No. 236165)
20 mmao@bsflp.com
21 44 Montgomery Street, 41st Floor
22 San Francisco, CA 94104
23 Telephone: (415) 293 6858
24 Facsimile: (415) 999 9695
25 Beko Reblitz-Richardson (CA Bar No. 238027)
26 brichardson@bsflp.com
27 44 Montgomery Street, 41st Floor
28 San Francisco, CA 94104
Tel: (415) 293 6858
Fax: (415) 999 9695

1 **SUSMAN GODFREY L.L.P.**
2 William Christopher Carmody (pro hac vice)
3 bcarmody@susmangodfrey.com
4 Shawn J. Rabin (pro hac vice)
5 srabin@susmangodfrey.com
6 1301 Avenue of the Americas, 32nd Floor
7 New York, NY 10019
8 Telephone: (212) 336-8330

9 **MORGAN & MORGAN**
10 John A. Yanchunis (pro hac vice)
11 jyanchunis@forthepeople.com
12 Ryan J. McGee (pro hac vice)
13 rmcgee@forthepeople.com
14 201 N. Franklin Street, 7th Floor
15 Tampa, FL 33602
16 Telephone: (813) 223-5505

17 *Counsel for Plaintiffs*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 ANIBAL RODRIGUEZ, et al. individually and on
22 behalf of all others similarly situated,

23 Plaintiff,

24 vs.

25 GOOGLE LLC,

26 Defendant.

27 Case No. 3:20-CV-04688-RS

28 **JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME FOR DEFENDANT TO ANSWER
PLAINTIFFS' THIRD AMENDED
COMPLAINT**

Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al.
 2 (“Plaintiffs”) and Defendant Google LLC (“Google”), hereby stipulate to the extension of the
 3 deadline for Google to answer Plaintiffs’ Third Amended Complaint by fourteen (14) days, from
 4 February 8, 2022 up to and including February 22, 2022.

5 Google and Plaintiffs (collectively, the “Parties”), by and through their respective counsel,
 6 hereby stipulate and agree to the following:

7 WHEREAS, on September 1, 2021 Plaintiffs filed their Third Amended Complaint for
 8 (1) Breach of Contract or, in the Alternative, Quasi-Contract (Unjust Enrichment); (2) Invasion of
 9 Privacy Act Violations, Cal. Penal Code § 631; (3) Violations of the Comprehensive Computer
 10 Data Access and Fraud Act (“CDAFA”), Cal. Penal Code §§ 502 *et seq.*; (4) Invasion of Privacy;
 11 (5) Intrusion Upon Seclusion (ECF No. 131);

12 WHEREAS, pursuant to Fed. R. Civ. P. 15(a)(3), Google’s deadline to respond to
 13 Plaintiffs’ Third Amended Complaint was September 15, 2021;

14 WHEREAS, on September 13, 2021, the Parties filed a stipulation to extend Google’s
 15 deadline to respond to Plaintiffs’ Third Amended Complaint seven (7) days, from September 15,
 16 2021 to September 22, 2021 (ECF No. 134);

17 WHEREAS, on September 13, 2021, the Court Ordered Google’s deadline for filing an
 18 Answer or to otherwise respond to Plaintiffs’ Third Amended Complaint was September 22, 2021
 19 (ECF No. 135);

20 WHEREAS, on September 22, 2021, Google filed its Notice of Motion and Motion to
 21 Dismiss Third Amended Complaint (ECF No. 139), Plaintiffs filed their Opposition on October 6,
 22 2021 (ECF No. 144), and Google filed its Reply on October 13, 2021 (ECF No. 145);

23 WHEREAS, on January 25, 2022, the Court issued an Order Granting Google’s Motion to
 24 Dismiss Counts 1 (Breach of Contract) and 2 (Cal. Penal Code § 631) of Plaintiffs’ Third
 25 Amended Complaint and did not grant Plaintiffs leave to amend (ECF No. 209);

26 WHEREAS, pursuant to Fed. R. Civ. P. 12(a)(4), Google’s deadline to answer the
 27 remaining counts in Plaintiffs’ Third Amended Complaint is February 8, 2022;

28 WHEREAS, the parties have agreed to extend time for Google to file its Answer;

WHEREAS, Google's deadlines to respond to the Complaint, First Amended Complaint, Second Amended Complaint, and Third Amended Complaint have been extended (ECF Nos. 33, 35, 58, 129, 135), and

WHEREAS this requested extension will not affect the case schedule;

WHEREAS, the requested extension of this deadline is made without prejudice to Google seeking a further extension of time should the circumstances warrant;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that Google's deadline to respond to Plaintiffs' Third Amended Complaint is February 22, 2021.

A Proposed Order is submitted concurrently herewith.

IT IS SO STIPULATED.

DATED: February 2, 2022

WILLKIE FARR & GALLAGHER, LLP

By: /s/ Benedict Y. Hur
Benedict Y. Hur

Attorneys for Defendant Google LLC

DATED: February 2, 2022

By: /s/ *Amanda Bonn*

BOIES SCHILLER FLEXNER LLP
Mark C. Mao (CA Bar No. 236165)
mmao@bsflp.com
Beko Reblitz-Richardson (CA Bar No.
238027)
brichardson@bsflp.com
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
Telephone: (415) 293 6858
Facsimile (415) 999 9695

James W. Lee (pro hac vice)
jlee@bsfllp.com
Rossana Baeza (pro hac vice)
rbaeza@bsfllp.com
100 SE 2nd Street, Suite 2800
Miami, FL 33130

Telephone: (305) 539-8400
Facsimile: (305) 539-1304

Jesse Panuccio (pro hac vice)
jpanuccio@bsfllp.com
1401 New York Ave, NW
Washington, DC 20005
Telephone: (202) 237-2727
Facsimile: (202) 237-6131

SUSMAN GODFREY L.L.P.
Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100

William Christopher Carmody (pro hac vice)
bcarmody@susmangodfrey.com
Shawn J. Rabin (pro hac vice)
srabin@susmangodfrey.com
Steven Shepard (pro hac vice)
sshepard@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
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jyanchunis@forthepeople.com
Ryan J. McGee (pro hac vice)
rmcghee@forthepeople.com
Ra Olusegun Amen (pro hac vice)
ramen@forthepeople.com
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505

Attorneys for Plaintiff

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2 **FILER'S ATTESTATION**
3

4 Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this
5 filing is submitted, concur in the filing's content and have authorized this filing.
6

7 DATED: February 2, 2022
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WILLKIE, FARR & GALLAGHER LLP
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11 */s/ Benedict Y. Hur*
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 63 TIME FOR DEFENDANT TO ANSWER
 64 PLAINTIFFS' THIRD AMENDED
 65 COMPLAINT**

66 Judge: Hon. Richard Seeborg
 67 Courtroom: 3, 17th Floor

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2 Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the deadline for
3 Google to respond to Plaintiffs' Third Amended Complaint is February 22, 2022.
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IT IS SO ORDERED.

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9 Dated: _____

10 Honorable Richard Seeborg
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